

# **EXHIBIT A**



**DLA Piper LLP (US)**  
1251 Avenue of the Americas  
27th Floor  
New York, New York 10020-1104  
www.dlapiper.com

Jonathan Siegfried  
Jonathan.Siegfried@dlapiper.com  
T 212.335.4925  
F 212.884.8477

July 29, 2022

**Via Email**

Gary M. Osen, Esq.  
Osen LLC  
2 University Plaza, Suite 402  
Hankensack, New Jersey 07601

**Re: *Averbach, et al. v. Cairo Amman Bank*, No. 1:19-cv-00004-GHW-KHP**

Dear Gary:

At the June 14, 2022 conference, Magistrate Judge Parker requested that we provide you with certain information regarding the sales of the Islamic branches, current and former CAB personnel, and whether there is an archived “back up tape” for the period 2001 to 2003. (Hr’g Tr. at 39). Please be advised as follows:

1. In 2005, CAB sold its three Islamic branches (Nablus, Hebron and Gaza) to Palestine Islamic Bank. The sale included the purchase of all customer accounts and documents related to those accounts. Accordingly, CAB does not have any account records or other documentation regarding customers at those branches. (Hr’g Tr. at 36).
2. There are no branch managers from the period 2001-2003 (*Id.* at 24) who are still with the Bank, nor any employees who had personal knowledge of accounts maintained at the Bank during that time period. They are all retired, resigned or deceased, to the best of the Bank’s knowledge. (*Id.* at 36-37).
3. With respect to Bank employees referenced in the complaint, Yazid Adnan Mustafa al-Mufti is still with the Bank, currently serving as its Chairman. There is no other Bank employee mentioned in the complaint who is still with the Bank. (*Id.*)
4. The Bank has no transaction records for any customer accounts for the period 2001 to 2003. Pursuant to its document retention policy, such records are maintained only for a period of 10 years. (*Id.* at 36).
5. The Bank is currently using Temenos T24 Core Banking System under IBM UNIX OS. The system was implemented during the period 2011-2013. The prior operating system



Gary M. Olsen, Esq.  
July 28, 2022  
Page Two

was the Kindle Banking System. The Bank cancelled the license in 2013. The Kindle system is not supported any more, nor is the associated OS and hardware. (*Id.* at 39-40).

6. There are no archived or back up tape systems for the period 2001 to 2003. (*Id.* at 39).
7. Transaction documents for the period 2001 to 2003 were not migrated to the new system. (*Id.* at 40).

Sincerely,

*/s/ Jonathan Siegfried*

Jonathan Siegfried

cc: All counsel (*via* email)